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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

| | | |
|--|---|--------------------------------|
| ALEXIS WAKEFIELD, |) | CASE NO.: 2:22-cv-00402 |
| |) | |
| Plaintiff, |) | |
| |) | |
| vs. |) | ORDER |
| |) | |
| JESSICA SALDANA; RONNIE J. |) | |
| SALDANA; DOES 1 through 10; ROE |) | |
| CORPORATIONS 11 through 20, inclusive, |) | |
| |) | |
| Defendant. |) | |

JOINT PRETRIAL

Following pretrial proceedings in this case,

IT IS ORDERED:

I.

NATURE OF THE CLAIM

This is an action for personal injuries allegedly sustained by Plaintiff in a motor vehicle accident with the Defendant. Plaintiff claims she was rear-ended by Defendant, Jessica Saldana causing injuries to the Plaintiff. Plaintiff claims Defendant failed to use due care and followed too close causing the collision occurring between the Defendant and the Plaintiff. Defendant claims Plaintiff performed an illegal U-turn which was the cause of the collision. Defendant further claims the impact was minor and that no injuries were incurred.

II.

STATEMENT OF JURISDICTION

This Court has diversity jurisdiction pursuant to 28 U.S.C. 1332 and 28 U.S.C. 2201. Plaintiff is a resident of State of Nevada. Defendant, Ronnie Saldana, is a Sergeant in the U.S. Air Force. Sergeant Saldana and his wife, Defendant Jessica Saldana, are presently residing in South Carolina. Plaintiff's alleged damages exceed the statutory jurisdictional limit of \$75,000.00.

III.

THE FOLLOWING FACTS ARE ADMITTED BY THE PARTIES

- A. The date of the automobile accident was on February 21, 2020.
- B. The location of the accident on Whitney Ranch in Henderson, Nevada.

IV.

THE FOLLOWING FACTS, THOUGH NOT ADMITTED, WILL NOT BE CONTESTED AT TRIAL BY EVIDENCE TO THE CONTRARY

None.

V.

THE FOLLOWING ARE THE ISSUES OF FACT TO BE TRIED AND DETERMINED AT TRIAL

- A. What injuries, if any, did Plaintiff suffer as a result of the accident on February 21, 2020?
- B. What past medical expenses, if any, did Plaintiff incur that were reasonable, necessary and as a result of the incident on February 21, 2020?
- C. What future medical expenses, if any, is the Plaintiff likely to incur that are reasonable, necessary and as a result of the incident on February 21, 2020?
- D. Who caused the collision to occur?

///

VI.

**THE FOLLOWING ARE THE ISSUES OF LAW TO BE TRIED
AND DETERMINED AT TRIAL**

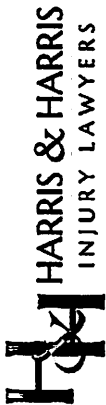
- A. Was the Defendant negligent as it relates to the alleged injuries suffered by Plaintiff?
- C. Was the Defendant negligence the cause Plaintiff's injuries and damages?
- D. Was the Plaintiff comparatively negligent, and, if so, for what percentage?

VII.

**THE FOLLOWING EXHIBITS ARE HEREBY IDENTIFIED, SUBJECT
TO THE OBJECTIONS DETAILED UNDER SUBSECTION C (a)**

Plaintiff's Exhibits

1. Billing and Medical Records from ST. ROSE DOMINICAN HOSPITAL-SIENA;
2. Billing from RADIOLOGY ASSOCIATES OF NEVADA;
3. Billing and Medical Records from GREGORY DOUDS, M.D.;
4. Billing and Medical Records from GREATHOUSE PHYSICAL THERAPY;
5. Billing and Medical Records from PUEBLO MEDICAL IMAGING;
6. Billing and Medical Records from PAIN INSTITUTE OF NEVADA;
7. Billing and Medical Records from PRO-FIT MEDICAL SUPPLIES, LLC
8. Billing and Medical Records from JACKSON PHYSICAL THERAPY;
9. Billing and Medical Records from LAS VEGAS RADIOLOGY;
10. Billing and Medical Records from NEVADA SPINE & DISC;
11. Billing and Medical Records from DIMURO PAIN MANAGEMENT;
12. Billing and Medical Records from DIMURO FACILITIES SERVICES;
13. Billing and Medical Records from LIENRX, LLC;
14. Billing and Medical Records from WILLIAM T. AZZOLI, M.D.;
15. Medical Records from VA SOUTHERN NEVADA HEALTHCARE;



16. Billing and Medical Records from INJURY REHAB;
17. Updated Medical Records and Billing from DIMURO PAIN MANAGEMENT;
18. Updated Medical Records and Billing from Las Vegas Neurosurgical;
19. John M. Dimuro, M.D.'s *Curriculum Vitae*, fee schedule and testimony list.

Defendant's Exhibits

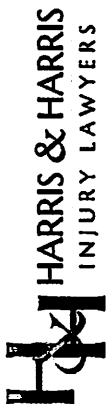
1. Recorded Statement of Defendant Jessica Saldana, taken February 21, 2020 (SALDANA 000001 – 000006);
2. Recorded Statement of Plaintiff Alexis Wakefield, taken April 8, 2020 (SALDANA 000007 – 0000010);
3. Correspondence from Matthew Q. Callister of Callister Law Group to Robert Smith, USAA, dated February 24, 2020, re notice of representation of Plaintiff and request for insurance coverage information (SALDANA 000011 – 000012);
4. Correspondence from Christian N. Griffin of Harris & Harris Injury Lawyers to Claims Department of USAA Insurance, dated January 12, 2021, re notice of representation of Plaintiff and request for insurance coverage information (SALDANA 000013);
5. Correspondence from Brian K. Harris of Harris & Harris Injury Lawyers to DaNelle Bushnell of USAA Insurance, dated December 7, 2021, re policy limit demand with attached medical records from various providers as identified below in paragraphs 6 through 20 (SALDANA 000014 – 000016);
6. Medical and billing records from St. Rose Dominican Hospital-Siena Campus (SALDANA 000017 – 000127);
7. Billing records from Radiology Associates of Nevada (SALDANA 000128);
8. Medical and billing records Las Vegas Neurosurgical Institute (SALDANA 000129 – 000178);
9. Medical and billing records from Greathouse Physical Therapy & Sports Science Training (SALDANA 000179 – 000199);



10. Medical and billing records from Pueblo Medical Imaging (SALDANA 000200 – 000203);
11. Medical and billing records from Pain Institute of Nevada (SALDANA 000204 – 000228);
12. Medical and billing records from Pro-Fit Medical Supplies, LLC (SALDANA 000229 – 000232);
13. Medical and billing records from Jackson Physical Therapy (SALDANA 000233 – 000295);
14. Medical and billing records from Las Vegas Radiology (SALDANA 000296 – 000315);
15. Medical and billing records from Nevada Spine and Disc (SALDANA 000316 – 000362);
16. Medical and billing records from DiMuro Pain Management/DiMuro Facilities Services/William Azzoli, M.D. (SALDANA 000363 – 000408; 000410 – 000508; 000510 – 000538);
17. Billing records from LienRx, LLC (SALDANA 000509);
18. Medical and billing records from Injury Rehab Associates (SALDANA 000409; SALDANA 000539 – 000546);
19. Correspondence from Brian K. Harris of Harris Injury Law to Claims Department of USAA Insurance, dated February 22, 2022, with copy of Plaintiff's complaint filed on January 6, 2022, against USAA insureds, Ronnie & Jessica Saldana (SALDANA 000547 – 000553);
20. Plaintiff's Initial Disclosure of Witnesses and Documents (SALDANA 000554 – 001106);
21. Policy Declaration Page (*redacted*) re Defendants' USAA Policy No. 02221 54 32G 7104, effective October 10, 2019 to February 22, 2020 (SALDANA 001107 – 001108);



22. Two (2) Photographs of Accident Site (SALDANA 001109 – 001110);
23. One (1) Photograph of Defendants' Vehicle (SALDANA 001111);
24. Screen Shots of Photographs of Accident Site and Defendants' Vehicle (SALDANA 001112 – 001114);
25. Screen Shots of USAA Property Damage Records, dated March 3, 2020 and March 9, 2020, regarding Defendants' Vehicle (SALDANA 001115 – 001117);
26. Court Docket and Plaintiff's Voluntary Bankruptcy Petition filed in U.S. Bankruptcy Court, District of Nevada (Las Vegas), Case No. 2:16-BK-11600, on March 26, 2016 (SALDANA 001118 – 001205);
27. Traffic Accident Report No. 14-15427 regarding October 1, 2014 motor vehicle accident involving Plaintiff received by way of subpoena and/or authorization (SALDANA 001206 – 001229);
28. Health club records from Las Vegas Athletic Club received by way of subpoena and/or authorization (SALDANA 001230 – 001253);
29. Medical records from Las Vegas Neurosurgical Institute received by way of subpoena and/or authorization (SALDANA 001254 – 001304);
30. Medical and billing records from Nevada Spine and Disc received by way of subpoena and/or authorization (SALDANA 001305 – 001369);
31. Billing records from Pro-Fit Medical Supplies, LLC received by way of subpoena and/or authorization (SALDANA 001370 – 001380);
32. Medical and billing records from Sean Early Physical Therapy received by way of subpoena and/or authorization (SALDANA 001381 – 001411);
33. Medical records from Pain Institute of Nevada received by way of subpoena and/or authorization (SALDANA 001412 – 001419);
34. Medical records from Walter Reed National Military Medical Center received by way of subpoena and/or authorization (SALDANA 001420 – 001430);
35. Medical records from St. Rose Dominican Hospital-Siena Campus received by



- 1 way of subpoena and/or authorization (SALDANA 001431 - 001527);
- 2 36. Claim File records from American Access Casualty Insurance Company
- 3 regarding Plaintiff's October 1, 2014 motor vehicle accident received by way of
- 4 subpoena and/or authorization (SALDANA 001528 - 001917);
- 5 37. Medical and billing records from William Azzoli, M.D. received by way of
- 6 subpoena and/or authorization (SALDANA 001918 – 001958);
- 7 38. Medical and billing records from DiMuro Pain Management received by way of
- 8 subpoena and/or authorization (SALDANA 001959 – 002255);
- 9 39. Medical and billing records from Greathouse Physical Therapy received by way
- 10 of subpoena and/or authorization (SALDANA 002256 – 002282);
- 11 40. Medical and billing records from Jackson Physical Therapy received by way of
- 12 subpoena and/or authorization (SALDANA 002283 – 002349);
- 13 41. Billing records from Las Vegas Neurosurgical Institute received by way of
- 14 subpoena and/or authorization (SALDANA 002350 – 002354);
- 15 42. Medical and billing records from Las Vegas Pain Institute received by way of
- 16 subpoena and/or authorization (SALDANA 002355 – 002386);
- 17 43. Medical and billing records from Las Vegas Radiology/HF Consulting, LLC
- 18 received by way of subpoena and/or authorization (SALDANA 002387 –
- 19 002443);
- 20 44. Billing records from LienRx, LLC received by way of subpoena and/or
- 21 authorization (SALDANA 002444 – 002454);
- 22 45. Certificate of No Records from Mountain View Hospital received by way of
- 23 subpoena and/or authorization (SALDANA 002455 – 002458);
- 24 46. Certificate of No Records from OrthoSport Physical Therapy received by way of
- 25 subpoena and/or authorization (SALDANA 002459 – 002469);
- 26 47. Medical and billing records from Pain Institute of Nevada received by way of
- 27 subpoena and/or authorization (SALDANA 002470 – 002542);
- 28



- 1 48. Medical and billing records from Pueblo Medical Imaging received by way of
- 2 subpoena and/or authorization (SALDANA 002543 – 002560);
- 3 49. Certificates of No Records from Sunrise Hospital and Medical Center received
- 4 by way of subpoena and/or authorization (SALDANA 002561 – 002568);
- 5 50. Medical records from VA Medical Center-Las Vegas received by way of
- 6 subpoena and/or authorization (SALDANA 002569 – 003492);
- 7 51. Claim file records from United Services Automobile Association regarding
- 8 Plaintiff's August 6, 2009 motor vehicle accident received by way of subpoena
- 9 and/or authorization (SALDANA 003493 – 003597);
- 10 52. Claim file records from United Services Automobile Association regarding
- 11 Plaintiff's July 23, 2010 motor vehicle accident received by way of subpoena
- 12 and/or authorization (SALDANA 003598 – 003692);
- 13 53. Claim file records from Progressive Insurance Company regarding Plaintiff's
- 14 March 25, 2012 motor vehicle accident received by way of subpoena and/or
- 15 authorization (SALDANA 003693 - 003741);
- 16 54. Claim file records from Progressive Insurance Companies regarding Plaintiff's
- 17 December 12, 2015 motor vehicle accident received by way of subpoena and/or
- 18 authorization (SALDANA 003742 – 003783);
- 19 55. Claim file records from Progressive Insurance Company regarding Plaintiff's
- 20 January 10, 2016 motor vehicle accident received by way of subpoena and/or
- 21 authorization (SALDANA 003784 – 003822);
- 22 56. Films from Las Vegas Radiology - (downloaded to password protected flash
- 23 drive and bates-stamp SALDANA 003823);
- 24 57. Films from Pueblo Medical Imaging – Las Vegas (downloaded to password
- 25 protected flash drive and bates-stamp SALDANA 003824);
- 26 58. Films from Dept. of Veterans Affairs/VA Health Care (downloaded to password
- 27 protected flash drive and bates-stamp SALDANA 003825);
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- 1 59. Films from St. Rose Dominican Hospital – Siena Campus (downloaded to
- 2 password protected flash drive and bates-stamp SALDANA 003826);
- 3 60. Medical and billing records from Family Doctors of Green Valley received by
- 4 way of subpoena and/or authorization (SALDANA 003827 – 003915);
- 5 61. Medical and billing records from Injury Rehab Associates received by way of
- 6 subpoena and/or authorization (SALDANA 003916 – 003943);
- 7 62. Medical and billing records from Interventional Pain and Spine Institute received
- 8 by way of subpoena and/or authorization (SALDANA 003944 – 003994);
- 9 63. Certificate of No Records for year 2011 from Las Vegas Pain Institute received
- 10 by way of subpoena and/or authorization (SALDANA 003995 – 03999);
- 11 64. Certificate of No Records from Los Angeles County Fire Department received by
- 12 way of subpoena and/or authorization (SALDANA 004000 – 004004);
- 13 65. Certificate of No Records-Billing from Mountain View Hospital c/o HCA
- 14 Atlanta Patient Accounts received by way of subpoena and/or authorization
- 15 (SALDANA 004005 – 004009);
- 16 66. Certificate of No Record from Nevada Imaging Centers received by way of
- 17 subpoena and/or authorization (SALDANA 004010 – 004020);
- 18 67. Certificate of No Records-Billing from St. Mary Medical Center received by way
- 19 of subpoena and/or authorization (SALDANA 004021 – 004031);
- 20 68. Medical and billing records from Steinberg Diagnostic Medical Imaging received
- 21 by way of subpoena and/or authorization (SALDANA 004032 – 004073);
- 22 69. Medical records from Walter Reed National Military Medical Center received by
- 23 way of subpoena and/or authorization (SALDANA 004074 – 004213);
- 24 70. Psychiatric records from Walter Reed National Military Medical Center received
- 25 by way of subpoena and/or authorization (SALDANA 004214 – 004352);
- 26 71. Redacted (medical records of Gelacio Chavez Duarte and Clayton Perez and
- 27 employment records of Mario A. Mejia Garcia) claim file records from
- 28



Progressive Insurance Company regarding Plaintiff's October 1, 2014 motor vehicle accident received by way of subpoena and/or authorization (SALDANA 004353 – 004702);

72. Medical records from Sean Early Physical Therapy (SALDANA 004703 – 004706);

73. Films from Steinberg Diagnostic Medical Imaging received by way of subpoena and/or authorization and downloaded to password protected flash drive No. 1769 – Password: 5!wK0!F8 (SALDANA 004707);

74. Certificates of No Medical/Billing/Film Records from Marina Del Rey Hospital/Cedars Sinai received by way of subpoena and/or authorization (SALDANA 004708 – 004734);

75. Certificate of No Records from Mountain West Chiropractic received by way of subpoena and/or authorization (SALDANA 004735 – 004744);

76. Medical and billing records from Neurology Center of Nevada received by way of subpoena and/or authorization (SALDANA 004745 – 004750);

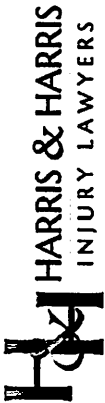
77. Billing records from Radiology Associates of Nevada received by way of subpoena and/or authorization (SALDANA 004751 – 4770);

78. Billing Records from St. Rose Dominican Hospital-Siena Campus received by way of subpoena and/or authorization (SALDANA 004771 – 004789);

79. Certificate of No Medical Records from St. Rose Dominican Hospital-Rosa De Lima Campus received by way of subpoena and/or authorization (SALDANA 004790 – 004795);

80. Certificate of No Billing Records from St. Rose Dominican Hospital-San Martin Campus received by way of subpoena and/or authorization (SALDANA 004796 – 004800).

81. Medical Report, CV, and list of testimony from Dr. Robert Berry.



(b) **AS TO THE EXHIBITS, THE PARTIES HAVE REACHED THE STIPULATIONS STATED:**

1. Stipulations as to Plaintiff's exhibits:

None.

2. Stipulations as to Defendant's exhibits:

None.

(b) **TO THE FOLLOWING EXHIBITS, THE PARTY AGAINST WHOM THE SAME WILL BE OFFERED OBJECTS TO THEIR ADMISSION UPON THE GROUNDS STATED:**

1. Objections to Plaintiff's exhibits:

Defendant objects to the admissibility of the Plaintiff's medical records without a proper foundation of testimony from a medical professional. Further, Defendant would object to the admission of Plaintiff's expert's reports, C.V., and testimony lists on hearsay grounds. Defendant reserves the right to amend and make further objections.

2. Objections to Defendant's exhibits:

(c) **ELECTRONIC EVIDENCE:**

The parties do not intend to present electronic evidence for purposes of jury deliberations.

(d) **DEPOSITIONS:**

1. Plaintiff will offer the following depositions:

Plaintiff reserves the right to publish any of the depositions at trial depending on the availability of the deponents.

2. Defendant will offer the following depositions:

Defendant reserves the right to publish any of the depositions taken in relation to this matter at trial depending on the availability of the deponents.

VIII.

THE FOLLOWING WITNESSES MAY BE CALLED BY THE PARTIES UPON TRIAL

A. Plaintiff reserves the right to call upon the following witnesses:

1. ALEXIS WAKEFIELD
c/o HARRIS & HARRIS INJURY LAWYERS
1645 Village Center Circle, Suite 60
Las Vegas, Nevada 89134
2. JESSICA SALDANA
c/o MCCORMICK, BARSTOW, SHEPPARD, WAYTE & CARRUTH
241 Ridge Street, Suite 300
Reno, Nevada 89501
3. RONNIE J. SALDANA
c/o MCCORMICK, BARSTOW, SHEPPARD, WAYTE & CARRUTH
241 Ridge Street, Suite 300
Reno, Nevada 89501
4. Angelo Kim, M.D.
Kathryn Ando, PA-C
Person(s) Most Knowledgeable and/or
Custodian of Records for
ST. ROSE DOMINICAN HOSPITAL-SIENA CAMPUS
3001 So. Rose Parkway
Henderson, Nevada 89052
5. Person(s) Most Knowledgeable and/or
Custodian of Records for
RADIOLOGY ASSOCIATES OF NEVADA
P.O. Box 305
SALT LAKE CITY, UT 84130-0077
6. Logan G. Douds, M.D.
Person(s) Most Knowledgeable and/or
Custodian of Records for
LAS VEGAS NEUROSURGICAL INSTITUTE
3012 So. Durango Drive
Las Vegas, Nevada 8911709186
7. James Greathouse, PT
Emily Ta, PT and/or
Person(s) Most Knowledgeable and/or
Custodian of Records for
GREATHOUSE PHYSICAL THERAPY
1845 Village Center Circle
Las Vegas, Nevada 89134



8. Person(s) Most Knowledgeable and/or
Custodian of Records for
PUEBLO MEDICAL IMAGING
5495 So. Rainbow Blvd., Suite 203
Las Vegas, Nevada 89118-1873
9. Katherine D. Travnicek, M.D.
Person(s) Most Knowledgeable and/or
Custodian of Records for
PAIN INSTITUTE OF NEVADA
7435 W. Azure Drive, Suite 190
Las Vegas, Nevada 89130
10. Person(s) Most Knowledgeable and/or
Custodian of Records for
PRO-FIT MEDICAL SUPPLIES, LLC
116 So. Church Street
Hudson, MI 49247-1301
11. Bart Taylor, PT, DPT
Person(s) Most Knowledgeable and/or
Custodian of Records for
JACKSON PHYSICAL THERAPY
100 North Green Valley Pkwy., Suite 335
Henderson, Nevada 89074
12. Person(s) Most Knowledgeable and/or
Custodian of Records for
LAS VEGAS RADIOLOGY
7500 Smoke Ranch Road,
Las Vegas, Nevada 89128
13. Jared L. Norman, DC
Person(s) Most Knowledgeable and/or
Custodian of Records for
NEVADA SPINE AND DISC
8665 So. Eastern Avenue, #103
Las Vegas, Nevada 89128
14. Dr. John DiMuro
Person(s) Most Knowledgeable and/or
Custodian of Records for
DIMURO PAIN MANAGEMENT
3970 W. Ann Road, Suite 100
North Las Vegas, Nevada 89031
15. Person(s) Most Knowledgeable and/or
Custodian of Records for
DIMURO FACILITIES SERVICES
3970 W. Ann Road, Suite 100
North Las Vegas, Nevada 89031



16. Person(s) Most Knowledgeable and/or
Custodian of Records for
LIENRX, LLC
2600 W. Sahara Avenue, Suite 120
Las Vegas, Nevada 89102
17. W. Azzoli, M.D.
Person(s) Most Knowledgeable and/or
Custodian of Records for
W. AZZOLI, M.D., PLLC
3970 W. Anne Road, Suite 100
North Las Vegas, Nevada 89031
18. Tausha Stephens, M.D.
Todd Christensen, M.D.
Person(s) Most Knowledgeable and/or
Custodian of Records for
DEPARTMENT OF VETERANS AFFAIRS
VA SOUTHERN NEVADA HEALTHCARE SYSTEM
6900 North Pecos Road
North Las Vegas, Nevada 89086
19. Fabiola Gonzalez
Person(s) Most Knowledgeable and/or
Custodian of Records for
INJURY REHAB ASSOCIATES
600 South Rancho Drive, Suite 113B
Las Vegas, Nevada 89106

B. Defendant reserves the right to call upon the following witnesses:

1. Alexis Wakefield
c/o Brian K. Harris, Esq.
Christian N. Griffin, Esq.
Harris & Harris Injury Lawyers
1645 Village Center Circle, Suite 60
Las Vegas, NV 89134
2. Jessica Saldana
c/o McCormick Barstow, LLP
241 Ridge Street, Suite 300
Reno, Nevada 89501
3. Ronnie J. Saldana
c/o McCormick Barstow, LLP
241 Ridge Street, Suite 300
Reno, Nevada 89501
4. PMK – William Azzoli, M.D.
3970 West Ann Road, Suites A-C
North Las Vegas, Nevada 89031



5. PMK – DiMuro Facilities Services, LLC
3970 West Ann Road, Suite 100
North Las Vegas, NV 89031
6. PMK – DiMuro Pain Management
3970 West Ann Road, Suite 100
North Las Vegas, NV 89031
7. PMK – Equian
P.O. Box 32710
Louisville, KY 40232
8. PMK – Greathouse Physical Therapy & Sports Science
1845 Village Center Circle
Las Vegas, Nevada 89134
9. PMK – Injury Rehab Associates
600 South Rancho Drive, Suite 113-B
Las Vegas, Nevada 89106
10. PMK – Jackson Physical Therapy
100 North Green Valley Parkway, Suite 335
Henderson, Nevada 89074
11. PMK – Las Vegas Neurosurgical Institute
3012 South Durango Drive
Las Vegas, Nevada 89117
12. PMK – Las Vegas Radiology
7500 Smoke Ranch Road, Suite 100
Las Vegas, Nevada 89128
13. PMK – Lien Rx, LLC
2600 West Sahara Avenue, Suite 120
Las Vegas, Nevada 89102
14. PMK – Nevada Spine and Disc
8665 South Eastern Avenue, Suite 103
Las Vegas, Nevada 89123
15. PMK – Pain Institute of Nevada
7435 West Azure Drive, Suite 190
Las Vegas, Nevada 89117
16. PMK – Pro-Fit Medical Supplies, LLC
115 South Church Street
Hudson, Michigan 49247
17. PMK – Pueblo Medical Imaging
8551 West Lake Mead Boulevard, Suite 150
Las Vegas, Nevada 89128



18. PMK – Radiology Associates of Nevada
P.O. Box 30077, Dept. 305
Salt Lake City, UT 84130
19. PMK – St. Rose Dominican Hospital-Siena Campus
3001 St. Rose Parkway
Henderson, Nevada 89052
20. PMK – VA Medical Center
6900 North Pecos Road
North Las Vegas, NV 89086
21. PMK – Republic Transport
2697 African Violet Avenue
Henderson, NV 89074
22. PMK – Sean Early Physical Therapy
8665 S. Eastern Avenue, Suite 103,
Las Vegas, NV 89123
23. Dr. Roert Berry M.D.
24. Sean Early
25. Any and all of Plaintiff's present and past healthcare providers.
26. Any and all of Plaintiff's witnesses.
27. Any and all other witnesses named by any other parties.

IX.

THREE ALTERNATIVE TRIAL DATES

Counsel have met and herewith submit a list of three (3) agreed-upon trial dates, in the order of preference.

1. February 12, 2024
2. June 17, 2024
3. June 24, 2024

It is expressly understood by the undersigned that the court will set the trial of this matter on one (1) of the agreed-upon dates if possible; if not, the trial will be set at the convenience of the Court's calendar.

X.

ESTIMATED TRIAL DURATION

It is estimated that the trial herein will take a total of 5-7 days.

DATED this 23rd day of August, 2023.
HARRIS & HARRIS INJURY LAWYERS

By: /s/ Brian K. Harris
Brian K. Harris, Esq.
Nevada Bar No. 7737
1645 Village Center Circle, Suite 60
Las Vegas, Nevada 89134
Brian@harrislawyers.com
Attorneys for Plaintiff

DATED this 23rd day of August, 2023.
MCCORMICK BARSTOW, LLP

By: /s/ Michael Pinter
MICHAEL PINTAR, ESQ.
Nevada Bar No. 3789
201 W. Liberty Street, Suite 320
Reno, Nevada 89501
Michael.Pinter@mccormickbarstow.com
Attorneys for Defendant

XI.

ACTION BY THE COURT

This case is set for ~~Court~~/Jury Trial on the ~~fixed~~/stacked calendar on 6/17/24 at 8:30 a.m.
Calendar call shall be held on 6/11/24 at 9:00 a.m.

This order is hereby entered and will govern the trial of this case considering that the parties reserve the right to supplement and/or amend the foregoing Joint Pretrial Order.

DATED this 23 day of August, 2023.


UNITED STATES DISTRICT JUDGE